

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

**IN RE:**

**JESUS JAVIER RIVERA CARIDE**

**DEBTOR**

**CASE NO. 24-02892 ESL**

**CHAPTER 13**

**DEBTOR'S REPLY TO OBJECTION TO CONFIRMATION OF PLAN  
(Related ECF No. 9)**

**TO THE HONORABLE COURT:**

**Introduction**

The debtor, through the undersigned counsel, respectfully submits this reply to the objection to the confirmation of the Chapter 13 Plan, as raised by *Banco Popular de Puerto Rico* ("BPPR"). The debtor addresses the concerns outlined by BPPR and requests the Court's consideration to deny the objection.

**Background**

1. **Filing of Objection by BPPR:** On July 18<sup>th</sup>, 2018, creditor filed an Objection to the confirmation of the plan. [See ECF no. 9]
2. **Nature of Objection:** The objection contends that the debtor's Chapter 13 Plan is not ready for confirmation alleging that the plan fails to provide for the pre-petition arrears and fails to comply with the requirements set forth in Sections 1325 and 1322(b)(2).

**Debtor's Response**

3. **Addressing the Issues:** The debtor filed an Amended Chapter 13 Plan dated July 31<sup>st</sup>, 2024, which complies with all the requests of the secured creditor. The Amended Plan provides for the pre-petition arrears and corrects the treatment in Section 8.5. [See ECF no.

**WHEREFORE**, the debtor respectfully requests that this Honorable Court take due notice of the aforementioned submissions and based on these considerations, deny the objection to the confirmation of the plan filed by BPPR.

**RESPECTFULLY SUBMITTED**

In Caguas, Puerto Rico, this 31<sup>st</sup> day of July 2024.

**CERTIFICATE OF SERVICE:** I CERTIFY that on this same date the foregoing document has been electronically filed WITH THE Clerk of the Court using the CM/ECF system which sends notification of such filing to all system's participants, including the U.S. Trustee's Office and the Trustee.

**s/ CARLOS A. RUIZ RODRIGUEZ**

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